

CHELSEA B. PAYMENT, OSB #141125
ANDREW D. COIT, OSB #972378
Cohen & Coit, PC
9200 SE Sunnybrook Ave, Suite 430
Clackamas, OR 97015
Ph: 503-231-3419
Fax: 503-231-3420
Chelsea@cohencoit.com
Andrew@cohencoit.com
Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

vs.

Plaintiff,

STEVEN DOUGLAS ROCKETT,

Defendant.

Case No.: 3:13-CR-00557-SI

DEFENDANT'S REQUESTED VOIR DIRE

NOW COMES Steven Douglas Rockett, through his attorneys, Andrew D. Coit and Chelsea B. Payment, and respectfully requests that the Court voir dire the jury using questions that require open-ended responses as much as possible. Counsel requests that, in addition to the typical questions the Court inquires of the jury, the following specific areas and questions be addressed.

I. CHILD PORNOGRAPHY AND CHILD ABUSE

1. Do the allegations in this case cause you to feel that you cannot be fair and impartial?
2. Have any family members or friends been victims of child abuse?

3. Can you think of any reasons a child or children would fabricate allegations of sexual abuse?
4. Oregon child abuse reporting law imposes a legal obligation on certain “public and private officials” to report child abuse. Are you a mandatory reporter?
5. Are there any issues in your background that would cause you to be hesitant to serve on a jury where you would be required to view illegal images that constitute child pornography?

II. COMPUTER EXPERTISE

1. Do you own a computer? If so, how long?
2. How would you describe your level of familiarity with computers?
3. Have you taken any training or educational courses in computer programming or networking?

III. BURDEN OF PROOF

1. If you were asked to retire now to deliberate and return a verdict, what would your verdict be?
 - a) Do you understand that it must be Not Guilty since the prosecution has presented no evidence and Mr. Rockett is entitled to the presumption of innocence?
2. Do you accept that the burden of proof is always on the government and that a person accused of a crime need not present any evidence on his behalf?
3. What type of proof do you feel would be necessary to conduct a child abuse case?
4. Is there any reason why you do not believe you could fairly judge this case?

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DATED this 2nd day of May, 2016.

/s/ ANDREW D. COIT

Andrew D. Coit, OSB #972378
Of Attorneys for Defendant